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4 Honorable James L. Robart

5 UNITED STATES DISTRICT COURT  
6 WESTERN DISTRICT OF WASHINGTON  
7 AT SEATTLE

8 THE HANOVER INSURANCE COMPANY,

9 Plaintiff,

10 vs.

11 INTREPID LAW GROUP, LLC, a  
12 Washington Limited Liability Company, THI  
13 HUYNH and JANE DOE HUYNH, and the  
14 marital community composed thereof, BRIAN  
15 ROUNDS, and TRACY TAKENAKA, and  
the marital community composed thereof;  
16 DONALD WOODARD an individual;  
17 JOSEPH PHAM, an individual; 4200  
18 LETITIA, LLC, a Washington LLC,

19 Defendants.

20 No. 2:20-cv-00662-JLR

21 **STIPULATION FOR ORDER OF  
DISMISSAL OF SUIT WITH  
PREJUDICE AND WITHOUT COSTS**

22 **NOTE ON MOTION CALENDAR  
MARCH 22, 2022**

23 **(CLERK'S ACTION REQUIRED)**

17 **I. STIPULATION**

18 The parties, by and through their respective counsel, hereby stipulate that this matter be  
19 dismissed with prejudice as to the claims for coverage for the Underlying Woodard matter and  
20 Underlying Takenaka Matter. The parties, by and through their respective counsel, hereby  
21 stipulate that the remaining claims are dismissed without prejudice, with each party bearing its  
22 own costs, and request that the proposed order below dismissing those claims be entered.

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Stipulation for Order of Dismissal of Suit with Prejudice and Without Costs – 1  
Cause No.: 2:20-cv-00662-JLR

3137892 / 520.0042

24 **FORSBERG & UMLAUF, P.S.**  
ATTORNEYS AT LAW  
901 FIFTH AVENUE • SUITE 1400  
SEATTLE, WASHINGTON 98164  
(206) 689-8500 • (206) 689-8501 FAX

1 Dated this 22<sup>nd</sup> day of March, 2022

2 FORSBERG & UMLAUF, P.S.

3 s/ Ryan J. Hesselgesser

Carl E. Forsberg, WSBA #17025  
4 Ryan J. Hesselgesser, WSBA #40720  
Attorneys for The Hanover Insurance  
5 Company  
Dated this 22<sup>nd</sup> day of March, 2022

6 LAW OFFICES OF STEPHEN M.  
7 HANSEN, P.S.

8 s/ Stephen M. Hansen

Stephen M. Hansen, WSBA #15642  
9 Attorneys for Defendant Brian Rounds and  
Tracy Takenaka  
10 Dated this 22<sup>nd</sup> day of March, 2022

11 MR. STEPHEN J. PLOWMAN

12 s/ Stephen J. Plowman

Stephen J. Plowman, WSBA #21823  
13 Attorneys for Defendant Joseph Pham and  
4200 Letitia, LLC

Dated this 22<sup>nd</sup> day of March, 2022

MILLER NASH, LLP

1 s/ Tristan N. Swanson

Carolyn A. Mount, WSBA #55527  
Tristan N. Swanson, WSBA #41934  
2 Attorneys for Defendant Intrepid Law Group,  
LLC and Thi Huynh  
Dated this 22<sup>nd</sup> day of March, 2022

3 LAW OFFICES OF VIC S. LAM, P.S.

4 s/ Vic S. Lam

Vic S. Lam, WSBA #25100  
5 Attorneys for Defendant Donald Woodard

11 **II. ORDER**

12 It is SO ORDERED

13 DONE this 23rd day of March, 2022.



14 Honorable James L. Robart  
15 United States District Judge